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10 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
14 situated,

15 Plaintiff,

16 vs.

17 STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
18 a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
19 Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

20 Defendants.
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Case No. 2:19-cv-02159-JCM-BNW

STIPULATION TO EXTEND TIME:

- (1) **FOR DEFENDANTS WYNN LAS VEGAS, LLC AND WYNN RESORTS, LTD TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT (Third Request); AND**
(2) **FOR ALL DEFENDANTS TO FILE MOTION TO CONTINUE STAY OF DISCOVERY (Third Request)**

22 IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader ("Plaintiff"),
23 through her counsel Richard Harris Law Firm, Defendants Wynn Las Vegas, LLC ("WLV") and
24 Wynn Resorts, Ltd. ("WRL"), through their counsel Jackson Lewis P.C., Defendant Stephen Alan
25 Wynn, through his counsel Peterson Baker, PLLC, and Defendant Maurice Wooden, by and
26 through his counsel Kennedy & Couvillier, that Defendants Wynn Las Vegas, LLC and Wynn
27 Resorts, Ltd. shall have a seven (7) day extension up to and including **April 7, 2020**, in which to
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1 file responses to Plaintiff's First Amended Complaint (ECF No. 90), and for all Defendants to file
2 Motions to Continue Stay of Discovery.

3 This Stipulation is submitted and based upon the following:

4 1. On May 11, 2020, the Court entered an Order granting Defendants' Motion for Stay
5 of Discovery. ECF No. 57.

6 2. On February 17, 2021, the Court entered an Order that, among other things, granted,
7 in part, Plaintiff's Motion for Leave to File her First Amended Complaint with respect to certain
8 claims. ECF No. 89. Pursuant to the Court's Order, the Clerk's Office filed Plaintiff's First
9 Amended Complaint on February 17, 2021. ECF No. 90.

10 3. The May 11, 2020 Order effectively provided that the parties are to file a joint
11 proposed discovery plan and scheduling order within 14 days after the Court's order resolving
12 Defendants' then-pending motions to dismiss, which was March 3, 2021.

13 4. On March 2, 2021, the Parties stipulated to extend the time for all Defendants to
14 respond to the First Amended Complaint from March 3, 2021 to March 17, 2021. ECF No. 91. The
15 Parties also agreed to effectively suspend the deadline to file the proposed discovery plan and
16 scheduling order, and to extend the time for Defendants' to file motions to continue the stay of
17 discovery. *Id.* The Court entered an order approving the Stipulation on March 9, 2021. ECF No.
18 92.

19 5. On March 11, 2021, the Parties stipulated to extend the time for all Defendants to
20 respond to the First Amended Complaint from March 17, 2021 to March 31, 2021. ECF No. 93.
21 The Parties also agreed to effectively suspend the deadline to file the proposed discovery plan and
22 scheduling order, and to extend the time for Defendants' to file motions to continue the stay of
23 discovery. *Id.*; ECF No. 94. The Court entered an order approving the Stipulation on March 15,
24 2021. ECF No. 95.

25 6. Subsequently, Defendants WLV and WRL have determined they need additional
26 time to finalize their respective responses to Plaintiff's First Amended Complaint. In addition,
27 Counsel for Defendants WLV and WRL has had to unexpectedly temporarily divert attention to a
28 significant document production analysis issue involving in excess of 25,000 documents in a trade

1 secrets arbitration matter which must be resolved on an expedited basis by order of the presiding
2 arbitrator.

3 7. Based on the foregoing, the Parties have stipulated to extend the time for Defendants
4 WLW and WRL to submit their respective responses to the First Amended Complaint to by seven
5 (7) days to April 7, 2021. The Parties have further stipulated that all Defendants shall have until
6 April 7, 2021 to file Motions to Continue the Discovery Stay.

7 8. Defendants WLW and WRL do not anticipate that any further extensions of the
8 deadlines related to these filings will be necessary.

9 9. This is the third request for an extension of time for Defendants WLW and WRL to
10 file their respective responses to Plaintiff's First Amended Complaint, and for all Defendants to file
11 Motions to Continue the Discovery Stay.

12 10. This request is made in good faith and not for the purpose of delay.

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11. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim or defense held by any party.

Dated this 31st day of March, 2021.

RICHARD HARRIS LAW FIRM

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/s/ Burke Huber

/s/ Joshua A. Sliker

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Stephen Alan Wynn*

ORDER

IT IS SO ORDERED:



United States

Magistrate Judge

Dated: 4/2/2021

4844-6394-5696, v. 1